



COMMONWEALTH OF VIRGINIA

HOUSE OF DELEGATES

RICHMOND

**C. TODD GILBERT**

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MINORITY LEADER

COMMITTEE ASSIGNMENTS:

FINANCE  
AGRICULTURE, CHESAPEAKE &  
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December 20, 2021

Ms. Muriel-Theresa Pitney  
Clerk of the Supreme Court of Virginia  
100 N. 9th St., 5<sup>th</sup> Floor  
Richmond, VA 23219

Dear Madam Clerk:

The House Republican Caucus respectfully submits two maps for consideration by the Court and the Special Masters. Both maps follow the requirements of the United States Constitution, including the 14th Amendment, the Voting Rights Act of 1965, the Constitution of Virginia, the Code of Virginia, and other applicable federal and state constitutional and statutory provisions.

The first map was drawn independently from the Special Masters' and represents an ideal map that follows the above criteria. We respectfully commend it to the Court and the Special Masters for consideration.

The Second Map begins with the Special Masters' map and simply unpairs two incumbents with as few other moves as possible to effectuate the unpairing. As has been widely reported, the Special Masters' map pairs numerous incumbents (and in two cases triples them). Both incumbents identified in the Second Map live adjacent to another district that does not currently have a resident legislator. Rather than force them to physically move or run against a colleague, the Second Map would slightly move the district lines. We understand that if the Court accepts some or all of this map, it may accept reciprocal unpairing for Democrat legislators who are similarly paired.

Founding Father Roger Sherman expressed the importance of preserving the ability of sitting legislators to continue serving when he stated, "Nothing renders government more unstable than a frequent change of the persons that administer it." The House of Delegates is in session for only 60 days and experiences significant turnover – in the 2021 term, 70 members had been Delegates for fewer than ten years and 40 members had been Delegates for fewer than five. A map that unnecessarily pairs legislators hampers institutional knowledge and the stability of the House. We respectfully ask the Court to adopt some or all of the changes in this map.

Copies of the maps and the shape files are included with this submission. Thank you for your consideration.

Regards,

A handwritten signature in black ink, appearing to read "C. Todd Gilbert".

C. Todd Gilbert  
House Minority Leader

Map # 1

<https://www.dropbox.com/t/lbrTgpDrOw0ezAJb>

Map # 2

<https://www.dropbox.com/t/zkoYB8AZoKu9aP6A>